

STIPULATION REGARDING MOTION TO COMPEL AND SUBPOENA

WHEREAS, on December 15, 2022, Plaintiff Everett Bloom served a subpoena for the production of documents and testimony on non-party Meta Platforms, Inc. in connection with *Bloom v. Zuffa, LLC*, Case No. 2:22-cv-00412-RFB-BNW (D. Nev.);

WHEREAS, on April 25, 2023, Plaintiff filed a motion to compel non-party production and deposition by Meta Platforms, Inc., instituting this action;

WHEREAS, the Court issued an order on May 2, 2023 directing Plaintiff to serve his motion to compel on Meta and file proof of service no later than May 9, 2023 and directing the parties to file a consent or declination form indicating whether they consented to the jurisdiction of the Magistrate Judge in this matter by May 23, 2023;

WHEREAS, Plaintiff and Meta each consented to the jurisdiction of the Magistrate Judge in this matter on May 23, 2023;

WHEREAS, on May 25, 2023, the Court set a briefing schedule and hearing on Plaintiff's motion to compel;

WHEREAS, pursuant to the Court's May 25, 2023 order, Meta's brief in opposition to the motion to compel was due no later than June 8, 2023 and Plaintiff's reply brief was due no later than June 15, 2023;

WHEREAS, the hearing on Plaintiff's motion to compel was originally scheduled for June 22, 2023 at 1:30 PM PST by Zoom videoconferencing;

WHEREAS, on June 5, 2023, Plaintiff and Meta filed a stipulation to extend the briefing schedule and continue the hearing date on Plaintiff's motion to compel in light of their active negotiations to resolve Plaintiff's motion to compel and subpoena;

WHEREAS, on June 5, 2023, the Court issued an order (Dkt. No. 9) extending Meta's deadline to file its opposition to the motion to compel to June 22, 2023; extending Plaintiff's deadline to file a reply in support of the motion to compel to June 29, 2023; and continuing the hearing on the motion to compel to July 25, 2023, at 10:00 a.m., via Zoom videoconferencing;

WHEREAS, Plaintiff and Meta have reached an agreement that will resolve Plaintiff's motion to compel and subpoena but additional time is needed to implement the agreement;

NOW, THEREFORE, pursuant to Local Civil Rule 7-12, subject to the approval of the Court, Plaintiff and Meta, by and through their respective counsel, hereby stipulate and agree that the deadlines for Meta's response to the motion to compel shall be extended from June 22, 2023 to August 17, 2023, Plaintiff's reply shall be extended from June 29, 2023, to August 24, 2023, and the hearing on Plaintiff's motion to compel currently set for July 25, 2023 at 10:00 a.m. by Zoom videoconference be rescheduled to September 12, 2023 at 10:00 a.m. in the event a hearing is necessary.

Accordingly, Plaintiff and Meta respectfully request that the Court issue an order extending the briefing schedule and resetting the hearing on Plaintiff's motion to compel.

IT IS SO STIPULATED.

Dated: June 16, 2023

GUTRIDE SAFIER LLP

By: /s/ Anthony J. Patek

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Dated: June 16, 2023

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[PROPOSED] ORDER

Having considered the parties' Stipulation, and good cause appearing therefore, the Court hereby **ORDERS**:

1. Meta Platforms, Inc.'s deadline to file a brief in opposition to the motion to compel is extended to August 17, 2023;

2. Plaintiff Everett Bloom's deadline to file a reply brief in support of his motion to compel is extended to August 24, 2023; and

3. The hearing for this matter is reset to September 12, 2023 at 10:00 a.m.

IT IS SO ORDERED.

Dated: _____

The Honorable Lisa J. Cisneros
United States Magistrate Judge

FILER'S ATTESTATION

Pursuant to Local Rule 5-1(h)(3), I attest that concurrence in the filing of this document has been obtained from each of the other signatories shown above and that all signatories have authorized placement of their electronic signatures on this document.

By: /s/ Anthony J. Patek
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